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May 20, 2021

VIA ECF

Hon. Colleen McMahon
Senior District Judge
United States District Court, Southern District of New York
500 Pearl Street, Room 2550
New York, NY 10007

**RE: 9 Kings Hong Kong Limited v. Beyond Masks, LLC et al.,
No. 1:21-cv-03155-CM**

Dear Judge McMahon:

I write on behalf of Plaintiff 9 Kings Hong Kong Limited (“9 Kings”) as well as Defendants Beyond Masks, LLC (“Beyond Masks”) and Schimeon A. Frederick, Jr. (“Mr. Frederick”) to seek clarification of the impact of the Court’s Scheduling Order of May 19, 2021 (ECF No. 32, the “Scheduling Order”).

In particular, 9 Kings, Beyond Masks, and Mr. Frederick seek clarification that, in light of the Scheduling Order, the May 26, 2021 deadline for the Parties to fax a Civil Case Management Plan to chambers (*see* ECF No. 21) is stayed until the status of Defendant Jason May (“Mr. May”) is clarified—particularly since the Civil Case Management Plan must be signed by all Parties and it remains unclear whether Mr. May is represented by counsel or proceeding *pro se*.

Furthermore, 9 Kings, Beyond Masks, and Mr. Frederick seek clarification from the Court that, if Mr. Frederick seeks to move to dismiss the Complaint for lack of personal jurisdiction and/or improper venue, and/or to transfer, then 9 Kings will then be afforded a 90-day period for jurisdictional discovery just as the Scheduling Order contemplates as to Mr. May. Counsel for Mr. Frederick advises that, if Mr. Frederick makes such a motion, he will do so by June 3, 2021.

Thank you for your attention to this matter.

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Respectfully submitted,

/s/ Timothy J. Bryant
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/s/ James L. Weintraub (with permission)
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cc: Jason May (via ECF)